DOCKET NO. HHD-CV20-6132285-S : SUPERIOR COURT

DIANNA PIAZZA : J.D. OF NEW HAVEN

V. : AT MILFORD

JOHN GALLAGHER and BEATRIZ : MARCH 2, 2021

GALLAGHER.

## MOTION FOR ORDER OF COMPLIANCE

The undersigned Defendants move the Court for an order compelling the Plaintiff to fully comply with the Defendant's Non-Standard Interrogatories and Requests for Production dated 12/8/2020.

The time within which to comply has now elapsed and the Plaintiff has failed to comply with said requests.

**WHEREFORE**, the Defendant requests this Court to rule the following relief:

- 1. Enter an order requiring the Plaintiff to adequately respond to said requests;
- Order a date certain by which Plaintiff must fully respond, or else become exposed to Nonsuit; and
- 3. Order any and all further relief that the court may deem necessary.

THE DEFENDANT(S), BEATRIZ GALLAGHER & JOHN GALLAGHER

BY /S/425022
Stephen J. Leary
Law Offices of Meehan, Roberts, Turret & Rosenbaum
108 Leigus Road, 1st Floor
Wallingford, CT 06492
Tel. # 203-294-7800

Juris # 408308

## **CERTIFICATION**

This is to certify that all personal identifying information was redacted pursuant to *Practice Book Section 4-7*. This will further certify the foregoing was mailed via U.S. Mail, postage pre-paid or electronically delivered pursuant to *Practice Book Section 10-14* on this 2<sup>ND</sup> day of March, 2021.

## Attorney for Plaintiff

Christopher M. Cerami, Esq. Willinger, Willinger & Bucci, P.C. 1000 Bridgeport Avenue Suite 501 Sheldon, CT 06484

Via Email: ccerami@wwblaw.com

/s/425022

Stephen J. Leary Commissioner of the Superior Court